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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

12 WUN CHEI CHAO, *et al.*,

Plaintiffs,

C 3:23-cv-00893 LJC

V.

STIPULATION TO DISMISS; ORDER

UR M. JADDOU, Director, U.S. Citizenship and Immigration Services, *et al.*,

Defendant.

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties, through their undersigned attorneys, hereby stipulate to dismiss this case on the following terms:

1. Defendant United States Citizenship and Immigration Services (“USCIS”) agrees to take initial adjudicative action – an approval, denial, Request for Evidence (“RFE”), Request for Clarification (“RFC”), or Notice of Intent to Deny (“NOID”) – based on the following schedule:

PRINCIPAL PLAINTIFF	DEADLINE FOR INITIAL ADJUDICATIVE ACTION FROM THE DATE OF THE EXECUTION OF THE VOLUNTARY DISMISSAL
TAN VAN HUYNH	90 days
MAI THI THUY MAI	90 days

1	BINGZE DU	90 days
2	LINGLING ZHAN	90 days
3	YIGIT ILYAS SEFTALI	90 days
4	DIEN THANH PHAN	90 days
5	JAICE JACOB	120 days
6	WUN CHEI CHAO	120 days
7	YING LI	120 days
8	MEENU VIKASH SACHAR	120 days
9	HUI LI	120 days
10	MEHMET HAKAN KORKMAZ	150 days
11	YUNLONG GUO	150 days
12	CAM THUY TRUONG	150 days
13	YUNJIANG HU	150 days
14	ASEELA LAMIYA	150 days
15	ZONGQING SHEN	150 days

14
15 2. If, after initial review, USCIS has or does issue to a Plaintiff an RFE, NOID, or RFC,
16 USCIS agrees to take the next adjudicative action within 45 days of receipt of each respective Plaintiff's
17 response to the RFE/NOID/RFC. This 45-day timeframe will apply to any subsequent adjudicative
18 actions, if applicable.

19 3. Plaintiffs' counsel agrees to notify Defendant's counsel by email within 5 days of
20 submission of a response to an RFE/NOID/RFC and provide Defendant's counsel with the tracking
21 information.

22 4. If Plaintiffs believe there is a breach of this agreement, Plaintiffs agree to give
23 Defendant's counsel notice and fourteen days to remedy such breach prior to seeking judicial
24 intervention.

25 5. If Defendant is unable to meet these deadlines for reason out of its control, it agrees to
26 notify counsel for Plaintiffs and Plaintiff's counsel agrees to work in good faith with Defendant to
27 resolve the issue without judicial intervention.

1 6. The parties agree to bear their own costs and fees.

2 Dated: April 19, 2023

Respectfully submitted,¹

3 ISMAIL J. RAMSEY
4 United States Attorney

5 /s/ Elizabeth D. Kurlan
6 ELIZABETH D. KURLAN
7 Assistant United States Attorney
8 Attorneys for Defendant

Dated: April 19, 2023

/s/ Bernard P. Wolfsdorf
BERNARD PAVEL WOLFSDORF
Attorney for Plaintiffs

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: April 19, 2023



LISA J. CISNEROS
United States Magistrate Judge

¹ In accordance with Civil Local Rule 5(h)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.